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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**
16

17 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
18 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
19 FIRE & CASUALTY INSURANCE
COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
23 MD, RUSSELL J. SHAH, MD, LTD., DIPTI
R. SHAH, MD, LTD., and RADAR
24 MEDICAL GROUP, LLP dba UNIVERSITY
URGENT CARE, DOES 1-100, and ROES
25 101-200,

26 Defendants.

27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFFS'
REPLY TO RESPONSE TO PLAINTIFFS'
MOTION FOR SANCTIONS PURSUANT
TO FRCP 11**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD., and
6 DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of record,
7 stipulate and agree as follows:

8 1. On March 16, 2018, the Allstate Parties filed their Motion for Sanctions Pursuant to
9 FRCP 11 [ECF No. 263] (the “Motion”);

10 2. Following two stipulated extensions of time for the Radar Parties to file a Response, on
11 April 20, 2018, the Radar Parties filed their Response to Plaintiffs’ Motion for Sanctions Pursuant to
12 FRCP 11; Defendants’ Counter-Request for Attorney’s Fees and Costs [ECF No. 273] (the
13 “Response”);

14 3. The Allstate Parties presently have until April 27, 2018 to file their Reply to the
15 Response to the Motion;

16 4. In order to fully address the issues presented, and due to additional scheduling conflicts
17 for the Allstate Parties’ counsel, the Allstate Parties shall now have up to and including May 11, 2018
18 to file their Reply to the Response to the Motion; and

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5. This is the first stipulation to extend the deadline to file the Reply to the Response to the Motion. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 26th day of April, 2018.

DATED this 26th day of April, 2018.

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

BAILEY ♦ KENNEDY

By: /s/ Todd W. Baxter

By: /s/ Joshua P. Gilmore

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IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated: April 26, 2018.